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August 2, 2024

VIA ECF

Honorable Arun Subramanian, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15A
New York, NY 10007

Re: Tammy Hamilton v. Kings Security Services Inc., et al.
Case No.: 1:24-cv-04533 (AS)

Dear Judge Subramanian:

This firm represents Defendants Kings Security Services Inc. and Evans Imafidon (collectively “Defendants”) in the above-captioned action. Defendants respectfully request an extension of time to respond to the complaint until September 2, 2024. The original due date to respond to the complaint was July 19, 2024¹ for Evans Imafidon and July 24, 2024² for Kings Security Services Inc. There have been no prior requests for adjournments or extensions of time in this action. Defendants seek this extension as counsel was recently retained to represent Defendants in this action and need time to investigate the facts of this case. Plaintiff consents to Defendants’ request. This request will not affect any other deadlines in this case as the initial conference is scheduled for September 5, 2024 at 12:00PM.

Defendants thank this Court for its time and attention to this matter.

Respectfully,

/s/
Kyle F. Monaghan, Esq.

Cc: Counsel of Record

¹ Arguably, the due date for Evans Imafidon to respond to the Complaint was July 22, 2024 because service was not completed on Evans Imafidon until a copy of the Complaint was mailed to him on July 1, 2024.

² Arguably, the due date for Kings Security Services Inc. to respond to the Complaint is August 3, 2024 because Kings Security Services Inc. was served via the Secretary of State and not personally served. See CPLR § 320.